

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

- v. - : INDICTMENT
: 08 Cr.

JUAN SORIANO,
RAYMOND HERNANDEZ, and
ANDY MALDONADO,

Defendants.

08 CRIM 409

COUNT ONE

The Grand Jury charges:

1. From in or about February 2008 through on or about April 10, 2008, in the Southern District of New York and elsewhere, JUAN SORIANO, RAYMOND HERNANDEZ, and ANDY MALDONADO, the defendants, and others known and unknown, unlawfully, intentionally and knowingly, did combine, conspire, confederate and agree together and with each other to violate the narcotics laws of the United States.

2. It was a part and object of the conspiracy that JUAN SORIANO, RAYMOND HERNANDEZ, and ANDY MALDONADO, the defendants, and others known and unknown, unlawfully, intentionally, and knowingly, would distribute and possess with intent to distribute a controlled substance, to wit, 5 kilograms and more of mixtures and substances containing a detectable amount of cocaine, in violation of Title 21, United States Code, Sections 812, 841(a)(1), and 841(b)(1)(A).

(Title 21, United States Code, Section 846)

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal objects thereof, JUAN SORIANO, RAYMOND HERNANDEZ, and ANDY MALDONADO, the defendants, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about February 28, 2008, JUAN SORIANO met with a confidential informant in the vicinity of 247 Dyckman Street in New York, New York.

b. On or about April 4, 2008, RAYMOND HERNANDEZ traveled from New York to El Paso, Texas.

c. On or about April 10, 2008, JUAN SORIANO and ANDY MALDONADO, the defendants, traveled to the vicinity of the Marriott hotel in Queens, New York.

(Title 21, United States Code, Section 846)

Forfeiture Allegation

4. As a result of committing the controlled substances offense alleged in Count One of this Indictment, JUAN SORIANO, RAYMOND HERNANDEZ, and ANDY MALDONADO, the defendants, shall forfeit to the United States, pursuant to 21 U.S.C. Section 853, any and all property constituting or derived from any proceeds the said defendants obtained directly or indirectly as a result of the said controlled substances violation and any and all property used or intended to be used in any manner or part to commit and to facilitate the commission of the controlled substances violation alleged in Count One of this Indictment, including but not limited

to the following:

- a. United States currency in the amount of \$199,960, recovered on or about April 10, 2008; and
- b. A black Ford Explorer with New York registration EGT8048 and Vehicle Identification Number 1FMZU74W23UA67744.

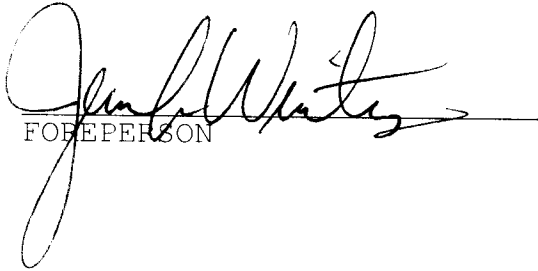
Substitute Asset Provision

5. If any of the property described above as being subject to forfeiture, as a result of any act or omission of the defendants:

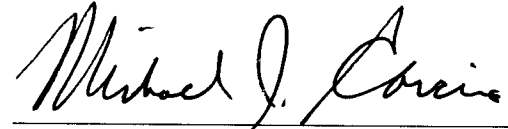
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intention of the United States, pursuant to 21 U.S.C. Section 853(p), to seek forfeiture of any other property of the defendants up to the value of the above forfeitable property.

(Title 21, United States Code, Sections 841(a)(1), 846 and 853.)



FOREPERSON



MICHAEL J. GARCIA
United States Attorney

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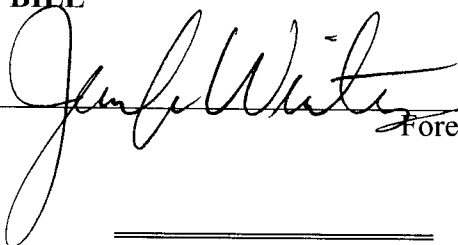
INDICTMENT

08 Cr.

(21 U.S.C. §§ 812, 841(a)(1), 841(b)(1)(A), & 846)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.

PC
5/8/08

Indictment filed, case assigned to
Judge Koeltl.

F. Maas, USMJ